RE: Sam Winer Motors
Summit County
Ohio ID # 277-1868

Mr. Kirk S. Riley, Program Coordinator
Technical Outreach Services for Communities (TOSC)
Michigan State University Office
B100A Research Complex - Engineering
East Lansing, MI 48824-1326

Dear Mr. Riley:

Ohio EPA has reviewed the draft TOSC Report of Findings, Review of the Sam Winer Motors Site, Akron, Ohio dated March 28, 2002. The draft report addresses both U.S. EPA and Ohio EPA investigations. The following comments will primarily be limited to the Ohio EPA investigation. It is the understanding of Ohio EPA that U.S. EPA will be responding under separate cover to the report.

U.S. EPA has recently completed another round of residential well and monitoring well sampling. Ohio EPA understands that these data have been forwarded to TOSC. Ohio EPA suggests that TOSC include these results in their final report.

Ohio EPA regrets that TOSC did not choose to work more closely with the Agencies during their evaluation of the Agencies investigations of the Sam Winer Site. Ohio EPA and U.S. EPA can provide information on the federal programs under which Ohio EPA and U.S. EPA conducted the investigations as well as goals and objectives.

If you have any questions, please call either Bill Batin at 614-836-8754 or Vicki Deppisch at 330-963-1207.

Sincerely,

Vicki Deppisch
Hydrogeologist/Project Coordinator
Division of Emergency and Remedial Response

Bill Batin
Site Investigation Field Unit Coordinator
Division of Emergency and Remedial Response

cc: Bill Skowronski, District Chief, NEDO
Rod Beals
Steve Love
Karla Auker, U. S. EPA
Andrew Kocher

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OHIO EPA COMMENTS ON
REPORT OF FINDINGS
REVIEW OF THE SAM WINER MOTORS SITE, AKRON, OHIO
PREPARED BY
THE TECHNICAL OUTREACH SERVICES FOR COMMUNITIES (TOSC) PROGRAM
AT MICHIGAN STATE UNIVERSITY, EAST LANSING, MICHIGAN
MARCH 28, 2002

Federal Integrated Assessment (IA) and Hazard Ranking System (HRS) Programs
The intent of an IA investigation is to identify environmental contamination, possible pathways in which contamination may travel, and receptors (targets) which may be affected. This information is used to determine if additional investigation is warranted and if the site is National Priorities List (NPL) caliber. It is not the objective of an Integrated Assessment to identify exact rate and extent of contamination, fate and transport modeling, a systematic characterization of the soils and groundwater, hydraulic gradients, spatial and temporal trends of chemical concentrations in the ground water and hydraulic conductivities. The TOSC report recommends actions outside the scope of the IA investigation.

Ohio EPA conducted a federally funded Integrated Assessment (IA) site investigation on July 6-7, 1999 at the Sam Winer Motor property in Springfield Township, Ohio. A final report was approved by U.S. EPA on July 13, 2000. This investigation and subsequent document followed the Federal Hazard Ranking System (HRS) Guidelines which are designed to evaluate potential sites for the NPL .

According to HRS guidelines, 40 CFR, Part 300, it has been determined that this site is not NPL caliber. This was based on the evaluation of all potential pathways including direct contact, surface water, ground water, and air. Regarding the ground water pathway, the basis for this determination was, 1) the low number of surrounding population utilizing local ground water, and 2) the lack of contamination in the nearest residential wells which may be attributable to any source. Without significant population, and actual well contamination, there is nothing to drive the HRS score for ground water, regardless of source concentration.

TOSC Conclusion 1: The findings of the Aerial Photographic Analysis Report have not been adequately addressed.
Ohio EPA Comment 1:
The Aerial Photographic Analysis Report (APA) was completed by U.S. EPA, Research Division, Las Vegas, NV, in March 1996 at the request of U.S. EPA, Emergency Response Section, for their investigation. The Ohio EPA conducted the IA in July 1999. The APA was reviewed and was used as a historical research document by Ohio EPA during the IA investigation. Ohio EPA utilized this document, and as stated in the IA, to attempt to verify the

conclusions drawn by the interpreters of the aerial photographs. The aerial photographic interpreters did not visit the site, but instead interpreted many of the "questionable" areas by speculation on possible discernible characteristics from their office. Ohio EPA tried to field verify their interpretations of the aerial photographs and many could not be confirmed by visual inspection. Stained ground, pits, disturbed land, stressed/dead vegetation, etc. interpreted from the APA could not be confirmed by Ohio EPA in 1999. Ohio EPA does not dispute that "drums, stained areas," or other anomalies may have been present between 1952 and 1990 according to the aerial photographs, but none were present in 1999 that Ohio EPA could field verify. Additionally, the APA covered areas outside of the Sam Winer property which were not within the scope of this investigation.

Most of the Sam Winer site is covered with broken bricks and stones. Besides collecting soil cores from the gas station/truck stop area, Ohio EPA attempted to collect soil cores from other areas of the site. These areas were chosen at random. Due to the large amount of brick and stone at the surface of the site, Ohio EPA was unable to penetrate the ground surface with the Geoprobe™.

TOSC Conclusion 2: Insufficient hydrogeologic and chemical data have been gathered at the site.

Ohio EPA Comment 2:

During the IA report, Ohio EPA found elevated concentrations of solvents and other contaminants in the subsurface at the former gas station/truck stop area. Residential wells in close proximity to this area were sampled. No contaminants were detected in the residential wells except for a duplicate sample which detected Bis(2-Ethylhexyl)phthalate at the MCL of 6 ug/L. The discovery of the contamination at the gas station/truck stop area and the lack of contamination of the residential wells were, according to HRS guidelines, important and necessary data for the HRS scoring. As stated above, the defined scope of the IA does not include an extensive hydrogeologic investigation.

TOSC concerns regarding the "Monitoring Well Installation and Ground Water Sampling and Analysis, Sam Winer Site, Akron, Ohio," report dated August 14, 2001 by US EPA, will be deferred to US EPA to comment. US EPA, lead agency at the Sam Winer site, did not consult with Ohio EPA during the installation of the monitoring wells.

The TOSC report states that the ground water flow direction could change due to seasonal fluctuations. Given the current conditions at the site, it is highly unlikely that the ground water flow direction would change with seasonal fluctuations. Features such as a gaining/losing stream, lake, river, large pumping/production wells, etc. that may affect ground water flow direction, do not appear to be located at or near the gas station/truck stop area.

TOSC Conclusion 3: Insufficient surface water sampling and analysis has been carried out.

Ohio EPA Comment 3:
There was no surface water available to sample during the 1999 IA investigation because the main drainage pathway is an intermittent stream. However, even if samples were collected, and contamination were found, there are a lack of human and ecological receptors within the 15 mile downstream Target Distance Limit. According to HRS Guidelines, this prevents this waterway from being a viable migratory pathway.

Ohio EPA's Division of Surface Water investigated and sampled a spring to the east of the Sam Winer site in 1993. The investigation found no contamination.

TOSC Conclusion 4: High on-site contaminant levels should be investigated.
Ohio EPA comment 4:
The goal of the Integrated Assessment was to determine whether Sam Winer Motors site has the potential for being a NPL caliber site. Using HRS Guidelines, Ohio EPA investigated and discovered a source of elevated solvent concentrations and other contaminants, and determined that surrounding residential wells were not being impacted from this source. Anything more would be outside the scope of the IA investigation.

The Sam Winer site is not considered NPL caliber. Even though the Sam Winer site is not NPL caliber, Ohio EPA requested US EPA to assess the site for possible removal action at the gas station/truck stop area. The goals of the Removal Program and the results of their assessment will be addressed separately by U.S. EPA.

The TOSC report primarily questions the U.S. EPA data. Appropriately, this is deferred to US EPA for response. However, Ohio EPA noted that TOSC has incorrectly reported the Method Detection Limit (MDL) units as mg/kg instead of ug/kg.

Regarding the IA laboratory data, Ohio EPA also has confidence in the data that was collected during the 1999 IA investigation that was used to reach these conclusions. U.S. EPA's Contract Laboratory Program (CLP.) labs must meet stringent Quality Assurance and Quality Control Guidelines to deliver reliable data to its users.

Also, it is common for CLP labs to have the same detection limits for many compounds. It is referred to as the CRQL (Contract Required Quantitation Limit) and CRDL (Contract Required Detection Limit).

TOSC Conclusion 5: Further sampling of residential wells is needed.
Ohio EPA Comment 5:
It appears that TOSC has misunderstood the facts and data and has drawn inaccurate conclusions regarding Ohio EPA IA sampling, U.S. EPA sampling, and conference call discussions. The TOSC report states the following:

"Additionally, during the IA investigation, 12 residential wells in the area were sampled in 1999. The Ohio EPA reports that NO constituents analyzed in the residential wells were above the method detection limits. During conference calls between TOSC and the Ohio EPA, however, Ohio EPA noted that one well sampled did show acrolein and cyclohexanone. The well was again sampled and no chemicals were found above detection limits. This was not included in the report because, as Ohio EPA indicated to TOSC during the conference calls, the chemical was suspected to be the result of a malfunctioning water pump, and thus an anomaly. The anomaly of acrolein and cyclohexanone in one of the drinking water wells was mentioned later in the August 14, 2001, US EPA document as the reason why the US EPA screened for the chemical.

It was appropriate that the US EPA tested for the occurrence of these chemicals in residential wells during later investigations. However, TOSC finds it irresponsible for this information not to be noted in the IA."

The above is inaccurate because of the following:

(1) The residential well with the malfunctioning water pump, located at 973 Bey Road, was sampled by Ohio EPA during the "Bey Road Sampling Investigation" conducted in 1993. Although close to the Sam Winer site, the Bey Road investigation is considered a separate site. The phthalates detected in the well were attributed to the burning pump. This investigation is referred to in the IA under Previous Site Work and reads "Analytical results of the water indicated no federal drinking water standards were exceeded." It is noteworthy to add that the resident declined an Ohio EPA offer to resample the well in 1993 and that U.S. EPA did include this well in the residential well sampling event of January 2002. No phthalates were detected above the method detection limit (MDL) in January 2002.

(2) The IA Report was conducted in July 1999 and approved by US EPA on July 5, 2000. As previously stated, during the IA investigation, all residential wells were below method detection limits except for a duplicate sample of semi-volatiles which detected Bis(2-Ethylhexyl)phthalate at the MCL of 6 ug/L.

(3) As previously stated, after completion of the IA, the Ohio EPA referred the Sam Winer site to the U.S. EPA for a removal assessment evaluation. The acrolein and cyclohexanone detects were from the US EPA residential sampling on January 25, 2001.

(4) Therefore, the U.S. EPA sampling data of January 25, 2001 could not be included in the IA of July 5, 2000 as the IA was completed before January 25, 2001.

TOSC Conclusion 6: The location of underground storage tanks and other metal objects has not been adequately addressed.

Ohio EPA Comment 6:
The TOSC report states the Aerial Photograph Analysis Report indicated the possible presence of underground storage tanks (USTs). Ohio EPA could find no references to USTs in the aerial report. It would be difficult to identify an UST from an aerial unless it was exposed on the surface, in which case it would no longer be a UST. TOSC should verify their reference.

Two 500 gallon USTs and one 800 gallon UST were identified during the IA at two locations. All three USTs were removed prior to the IA investigation; however, the final closure reports were never submitted to the State Fire Marshall's Office. The closure of these areas are being addressed and are under the jurisdiction of the State Fire Marshall's office, Bureau of Underground Storage Tanks (BUSTR).

Ohio EPA Conclusion:

Ohio EPA investigates and prioritizes many sites on an annual basis. Based on HRS guidelines, it is the conclusion of Ohio EPA that the Sam Winer site does not meet the criteria for a NPL listing based on the data collected on sources and receptors. Ohio EPA is confident that the Integrated Assessment performed in 1999 adequately achieved its goal for Site Assessment using the Hazard Ranking System criteria for NPL screening.